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Class Counsel

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

DANA GOLD, TAMMY EMERY, MARY
LOUISE FERENCE, LAURA NORRIS,
DONALD FURSMAN, and JOHN TRIANA, on
behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

LUMBER LIQUIDATORS, INC., a Delaware
corporation; and DOES 1 through 200,
inclusive,

Defendants.

No. 3:14-cv-05373-RS

**DECLARATION OF MICHAEL F. RAM
REGARDING DISBURSEMENT AND
ACCOUNTING OF SETTLEMENT
FUND**

The Honorable Richard Seeborg

1 I, Michael F. Ram, declare as follows:

2 1. I am an attorney with Morgan & Morgan, Complex Litigation Group, and one of
3 the co-lead Class Counsel. I respectfully submit this declaration pursuant to the Court's Order
4 Granting Motion For Final Approval of Settlement Agreement (ECF 331).

5 2. Attached as **Exhibit A** is the Declaration Of Abel E. Morales On Behalf Of Cpt
6 Group, Inc. With Respect To Disbursement And Accounting Of Settlement Fund.

7 3. Attached as **Exhibit B** is a chart entitled, "Summary of Settlement - *Gold v.*
8 *Lumber Liquidators*, No. 3:14-cv-05373-RS" which sets out a summary of the settlement
9 disbursements and is being posted by CPT Group on the settlement web site,
10 <https://www.bamboosettlement.com>.

11 4. The Settlement Fund included non-monetary relief in the form of \$16,000,000 in
12 store vouchers that can be redeemed at Lumber Liquidators for any of the over 500 flooring and
13 non-flooring products it sells, or to use for labor for installation or repair. Vouchers were
14 included as part of the Settlement Fund was that Lumber Liquidators did not have sufficient
15 cash to pay the settlement, or to pay a judgment had this case proceeded to trial. The vouchers
16 were awarded almost exclusively to Class Members as compensation for Level One claims,
17 which are claims where none of the flooring manifests damage. The exception to providing
18 vouchers only for Level One were those Level Two claimants who had selected the "More
19 vouchers – less cash claims" on the claim form. Of the 7,395 valid Level Two claims, 1,050
20 (or 14.20 percent) selected this option and were awarded 25 percent of their claims in cash, and
21 the remaining 75 percent in vouchers.

22 I declare under penalty of perjury under the laws of the United States of America that
23 the foregoing is true and correct. Executed at San Francisco, California, this 22nd day of
24 September, 2021.

25 /s/ Michael F. Ram
26 Michael F. Ram
27